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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION

HEATHER BOONE and ROXANNE  
RIVERA, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

CRISTIAN BARRERA, individually,

Plaintiff

v.

AMAZON.COM SERVICES, LLC,

Defendant.

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*Attorneys for Defendant*

**JOINT STIPULATION TO EXTEND THE  
DEADLINE TO FILE DISPOSITIONAL  
PAPERS AND [PROPOSED] ORDER**

Case No. 1:21-CV-00241-ADA-BAM – LEAD  
Case No. 1:22-CV-00146-ADA-BAM-MEMBER

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*Attorneys for Plaintiff Cristian Barrera*

1 Plaintiffs Heather Boone, Roxanne Rivera, and Cristian Barrera and Defendant Amazon.com  
2 Services LLC (collectively, the “Parties”), by and through their undersigned counsel of record, hereby  
3 stipulate and request as follows:

4 WHEREAS, on August 22, 2023, the Parties submitted a Notice of Settlement informing the  
5 Court that they had reached a tentative settlement;

6 WHEREAS, on August 23, 2023, the Court, pursuant to Local Rule 160, ordered that the Parties  
7 file appropriate papers to dismiss or conclude this action in its entirety by September 12, 2023;

8 WHEREAS, on September 6, 2023, the Court extended the deadline to file dispositional papers  
9 to November 13, 2023;

10 WHEREAS, the Parties have made significant progress but need additional time to finalize and  
11 complete negotiations over the contents of a detailed long-form settlement agreement;

12 WHEREAS, because the long-form settlement agreement has not yet been finalized, Plaintiffs  
13 need additional time to prepare a motion for preliminary approval of a class-wide settlement to address  
14 the claims of more than 230,000 putative class members;

15 WHEREAS, the Parties are working diligently to complete the necessary dispositional papers  
16 to submit to the Court, but, in light of these circumstances above, require additional time to complete  
17 that work;

18 WHEREAS, the Parties respectfully submit that good cause exists for an extension of the  
19 deadline to file dispositional papers with the Court, *see* Local Rule 160(b);

20 THEREFORE, IT IS STIPULATED AND REQUESTED THAT, by and between the  
21 undersigned counsel, and subject to the Court’s approval, good cause exists to extend the November  
22 13, 2023 deadline by 30 days such that the Parties may file appropriate papers to dismiss or conclude  
23 this action in its entirety by December 13, 2023.

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1 AGREED TO BY:

2 Dated: November 9, 2023

HODGES & FOTY, LLP

3  
4 By: /s/ Don J. Foty  
Don J. Foty (admitted *pro hac vice*)  
5 David W. Hodges (admitted *pro hac vice*)

6 *Attorneys for Plaintiffs Heather Boone and Roxanne*  
7 *Rivera*

8 Dated: November 9, 2023

GIBSON, DUNN & CRUTCHER LLP

9 By: /s/ Bradley J. Hamburger  
Bradley J. Hamburger  
10 Tiffany Phan  
Andrew G.I. Kilberg (admitted *pro hac vice*)

11 *Attorneys for Defendant Amazon.com Services LLC*

12 Dated: November 9, 2023

THE NOURMAND LAW FIRM, APC

13  
14 By: /s/ Kyle J. Ignatius  
Michael Nourmand  
15 James A. De Sario  
Kyle J. Ignatius

16 *Attorneys for Plaintiff Cristian Barrera*  
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**ORDER**

Pursuant to the Parties' Joint Stipulation to Extend the Deadline to File Dispositional Papers, and good cause appearing, the deadline to file dispositional papers is extended. *See* L.R. 160. The parties shall file dispositional papers no later than December 13, 2023.

IT IS SO ORDERED.

Dated: November 9, 2023

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE